

May 2, 2018

United State Bankruptcy Court
1 John F Gerry Plaza
4th Cooper Streets
Camden, NJ 08101

FILED
JEANNE A. NAUGHTON, CLERK
MAY - 4 2018
U.S. BANKRUPTCY COURT
CAMDEN, N.J.
BY JP DEPUTY

Re: Carol L Anisi - Chapter 13 – Case No.: 16-33204 – Judge JNP

**OPPOSITION TO RELIEF SOUGHT FROM THE AUTOMATIC STAY BY JP
MORGAN CHASE BANK - HEARING SCHEDULED FOR MAY 15, 2018 at 10:00
am**

Dear Sir or Madam:

Please be advised that I wish to oppose the Notice of Motion for Relief from the Automatic Stay in my Chapter 13 Bankruptcy filing. I wish to have a Hearing scheduled should this matter not be resolved prior to the return date above.

I have been stricken with medical and other issues that have made it almost impossible for me to keep current on post-petition payments. I am at this moment in a much better position to cure arrears.

There are 32 months left in this Chapter 13 Plan, I would like to propose my arrears be spread out over the 32 months.

I have reached out to Aleksander Powietrzynski, Esquire with regard to a payment arrangement. .

If this arrangement is not satisfactory, please provide a counter to this arrangement. I do not and cannot have this vehicle repossessed. I need to have transportation to get to work.

I hope that you will work with me. Thank you for your attention to this matter.

Sincerely,



Carol L. Anisi
615 Autumn Crest Drive
Waterford, NJ 08089
canisi@jacobslawoffice.com
856-357-0039

cc: Lee Abt, Esq
Aleksander Powietrzynski, Esq
Isabel Balboa, Trustee
US Trustee

Carol Anisi, Debtor
615 Autumn Crest Drive
Waterford, NJ 08089
(856) 357-0039

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U.S. BANKRUPTCY COURT
CAMDEN, N.J.
BY _____ DEPUTY

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In Re:

Case No. 16-33204-JNP
Chapter 13

Carol L. Anisi,

Debtor.

**OBJECTION TO NOTICE OF MOTION FOR
RELIEF FROM AUTOMATIC STAY with regard to
the 2009 BMW X5**

I, Carol Anisi, object to the Notice of Motion for Relief from the Automatic Stay.

1. I wish to enter into an arrangement to cure all post-petition arrears by making regular monthly payments as well as additional payments.
2. There are approximately 32 months left on my Chapter 13 plan.
3. I propose to pay the arrears over the life of the Chapter 13 plan with 32 equal additional payments along with the regular monthly payment.

Dated: May 2, 2018



Carol Anisi, Debtor